

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: PALASOTA CONTRACTING, LLC DEBTOR	§ § §	CASE NO. 23-31447-H5-11 (Chapter 11)
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**MOTION FOR EXTENSION OF DEADLINES
IN POST-CONFIRMATION ORDER**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

To: The Honorable Eduardo Rodriguez,
Chief United States Bankruptcy Judge:

COMES NOW Palasota Contracting, LLC (“Debtor” or “Applicant”) and files this *Motion For Extension of Deadlines in Post-Confirmation Order* (“Motion”) and, in support thereof, would respectfully show as follows:

1. On March 14, 2024, the Debtor filed its Seventh Amended Plan (Docket 215) and a proposed Confirmation Order (Docket 217).
2. On March 14, 2024, this Court held a hearing during which the Debtor's Seventh Amended Chapter 11 Plan was confirmed. On March 14, 2024, this Court entered its Order Confirming the Seventh Amended Plan (Docket 217).
3. Subsequent to the Confirmation Hearing, this Court entered an Order-Post

Confirmation (Docket 220) (“Order”) which sets March 28, 2024 as the deadline to file all final fee applications for professionals retained in the case, any outstanding Monthly Operating Reports (“MORs”), pay all outstanding US Trustee Quarterly Fees, and the filing of the Motion For Final Decree.

4. The Debtor’s counsel has filed its final fee application as required by the Order.

5. The Debtor’s accountant, Peggy Piletere, is currently preparing the outstanding MORs for December, January, February, as well as the one due for March 1-14, 2024. Ms. Piletere maintains a regular accounting practice and has both corporate and individual clients who are required to file tax returns during the March – April tax season. Ms. Piletere is working diligently to finalize the MORs required and complete her fee application, but is unable to complete all of the required reports prior to the March 28, 2024, deadline set forth in the Order.

6. Without Ms. Pilete’s assistance, the Debtor will be unable to comply with the Court’s Order. The Debtor seeks to extend the March 28, 2024, deadline to April 30, 2024, to allow Ms. Piletere sufficient time to complete the reports, assist the Debtor in determining the total amount of disbursements made during the relevant time period, calculate the total US Trustee Quarterly Fees owed, and file her final fee application.

7. Upon the filing of the required MORs and professional fee application for Ms. Piletere and payment of the US Trustee Quarterly Fees, and the Debtor intends to file a Motion for Entry of Final Decree.

WHEREFORE, PREMISES CONSIDERED, the Palasota Contracting LLC requests this Court enter its Order extending the deadline for the filing of all Monthly Operating Reports, payment of US Trustee Quarterly Fees, and the filing of a Motion for Entry of Final Decree to April 30, 2024, and for all other relief to which it may be entitled.

Respectfully submitted,

WALDRON & SCHNEIDER, PLLC

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COUNSEL FOR DEBTOR

CERTIFICATE OF CONFERENCE

I hereby certify that, on March 27, 2024, I conferred with Ross C. Travis, attorney with the US Trustee's Office, via electronic mail regarding the Motion. Mr. Travis advised he is not opposed to the relief sought.

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the Motion For Extension of Deadlines in Post-Confirmation Order was served upon the attached service list via the Court's ecf system and via First Class Mail, postage prepaid on March 27, 2024.

/s/ Kimberly A. Bartley

Kimberly A. Bartley

st
Case No, 23-31447-H5-11
In Re Palasota Contracting, LLC

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